

MURIEL GOODE-TRUFANT Corporation Counsel THE CITY OF NEW YORK

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May 20, 2025

VIA ECF

Honorable Joseph A. Marutollo United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Raffique Khan v. City of New York, et. al.

24 CV 2168 (ARR) (JAM)

Your Honor:

I am Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, one of the attorneys for Defendants City of New York, Mayor Eric L. Adams, Commissioner Edward A. Caban, Deputy Commissioner Michael Gerber, Police Officer Matthew S. Bessen, former Officer Joseph Astarita, Officer Jeisen Jara, Officer Joseph Jacobsen, Sergeant Patrick Hughes, Officer Mohamed Eldiastry, Officer Thomas Costigan, and Officer Noah Nicholson ("Defendants") in the above-referenced action. I write to provide the Court with a joint status report pursuant to Your Honor's May 2, 2025 Order.

Parties continue to engage in non-Monell discovery. Depositions of Officer Matthew Bessen, former Officer Joseph Astarita, Officer Noah Nicholson, and Sergeant Patrick Hughes are complete. Parties are in the process of scheduling the final deposition, of Officer Thomas Costigan. Parties have agreed upon timelines for serving and responding to additional discovery demands.

Respectfully submitted,

/s/ Jessica Katzen
Jessica Katzen
Assistant Corporation Counsel

To:

VIA ECF
Todd Greenberg
Jonathan Edelstein
Attorneys for Plaintiff